



April 9, 2003

DAN G. LAFEVER
Senior Vice President
Corporate Director of Merchandising

The Honorable Ann Veneman
Secretary of Agriculture
1400 Independence Avenue, SW
Washington, DC 20250

Re: Country of Origin Labeling Program

Dear Secretary Veneman,

I am the senior vice president of procurement and sales for Winn-Dixie Stores, Inc., a chain of over 1,000 supermarkets in the Southeast. It is my responsibility to oversee compliance of the country of origin labeling program for our Company.

We intend to comply with country of origin labeling when it becomes mandatory on September 30, 2004.

However, we have a serious problem with our company being held responsible for the accuracy of our supplier's country of origin determinations. We believe USDA must hold "covered commodity" product suppliers accountable for the country of origin determinations that they make as governmental agencies now hold packaged goods suppliers responsible for the labeling on their products. Suppliers are the only ones who can determine a product's country of origin accurately. If we want to provide consumers with accurate country of origin information on these products, USDA must require suppliers to provide information to retailers, directly on the products, and USDA must hold them accountable for the accuracy of that information.

Since there is no way to link an unpackaged covered commodity to a specific supplier once the product has been removed from the retail store, retailers should not be required to keep two years worth of records at store level. Retaining records for this period of time at the retail level will serve no useful purpose while incurring substantial cost.

One efficient way to ensure that consumers receive accurate country of origin information on some covered commodities, such as produce, is for suppliers to label (sticker) the individual items with country of origin information. Even though some labels may not stick on the product, if the majority of individual covered commodity items bear a label indicating the product's country of origin, the retailer should have met the statute's requirement to inform the consumer of the country of origin of that covered commodity and has not willfully violated the statute.

Finally, we urge you to conduct the rulemaking promptly and efficiently. Section 285 of the statute states that the provision "shall apply to the retail sale of a covered commodity beginning September 30, 2004." Since we are required to set up significant systems to obtain the necessary information from our suppliers, to provide the information to consumers, and then to retain the information, we must know what those systems must accommodate as quickly as possible.

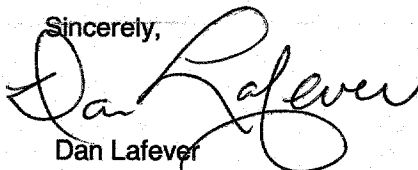
The Honorable Ann Veneman
April 9, 2003
Page 2

We appreciate your consideration of our concerns and urge you to develop the regulations using the foregoing recommendations as expeditiously as possible.

We trust that USDA has the same desire as our company, to provide the most accurate information on the best available product to consumers at the lowest possible cost. Eliminating cost unnecessary to achieving the desired results should be our common goal.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan Lafever". The signature is fluid and cursive, with the first name "Dan" and last name "Lafever" clearly distinguishable.

Dan Lafever
Senior Vice President
Sales and Procurement

cc: USDA AMS Docket
Room 2085-S
Mail Stop 0299
1400 Independence Ave., SW
Washington, DC 20250-0299